

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA**

THE STATE OF LOUISIANA,
By and through its Attorney General, JEFF
LANDRY, et al.,

PLAINTIFFS,

v.

JOSEPH R. BIDEN, JR., in his official capacity
as President of the United States; et al.,

DEFENDANTS.

CIVIL ACTION NO. 2:21-cv-778-TAD-KK

MOTION FOR PRELIMINARY INJUNCTION

The States of Louisiana, Alabama, Alaska, Arkansas, Georgia, Mississippi, Missouri, Montana, Nebraska, Oklahoma, Texas, Utah, and West Virginia (collectively “Plaintiff States”) respectfully move this Court for an order under Rule 65 of the Federal Rules of Civil Procedure granting a preliminary injunction, with expedited consideration, in their favor against the named Defendants in their official capacities. As explained in the Complaint and attached Memorandum, Defendants have violated the Outer Continental Shelf Lands Act, Mineral Leasing Act, and Administrative Procedure Act by issuing and implementing Moratoriums on oil and gas leases on public lands and the Outer Continental Shelf.

This Motion is made on the grounds specified in this Motion, the Complaint, the accompanying Memorandum of Law, the exhibits attached to the Complaint and to this Motion, all matters of which this Court may take judicial notice, and on such other and further oral or documentary evidence as may be presented to the Court at or before the hearing on this Motion. Plaintiff States are substantially likely to prevail on the merits of their claims and preliminary injunctive relief is necessary to avoid substantial injuries to their sovereign, quasi-sovereign, and proprietary

interests. And the public interest and balance of harms favor an order compelling Defendants to follow the law.

For these reasons and those explained in the attached Motion, Plaintiff States respectfully request a preliminary injunction ordering Defendants to disregard the OCSLA Leasing Moratorium and the MLA Leasing Moratorium and to execute the statutory duties of their offices regarding oil and gas leasing as if the Moratoriums did not exist. Plaintiff States also ask the Court to preliminarily enjoin Defendants from implementing the Recission of Lease Sale 257, postponement of Lease Sale 258, postponements of MLA quarterly lease sales, and any other action taken in reliance upon the Leasing Moratoriums.

Respectfully submitted,

Dated: March 31, 2021

/s/_____

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**Admission application forthcoming*